

Defendant.

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Site Visits: During the fall of 2017, the Plaintiff Parties shall conduct site visits of the District and interview appropriate District personnel. The District agrees to coordinate with the Plaintiff Parties to schedule follow-up site visits, as requested.

Factual Discovery: The parties shall complete fact discovery no later than October 31, 2017.

Expert Discovery: Expert witnesses, if necessary, shall be retained by November 1, 2017. The parties shall complete expert discovery no later than February 1, 2018.

Meeting of the Parties: The parties shall meet as soon as practical to attempt to negotiate a joint proposed consent order addressing each of the *Green* factors. The parties shall provide the Court with status updates via teleconference in mid-November 2017 and mid-February 2018.

Joint Proposed Consent Order: Although the parties may conclude negotiation of consent order terms pertaining to individual *Green* factors on a rolling basis, and the District may begin planning and preparation in accordance therewith, negotiation of a comprehensive joint proposed consent order shall be completed no later than May 31, 2018.

Respectfully submitted on this 24th day of May, 2017.

For Plaintiff-Intervenor United States of America:

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